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**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

In re:

PG&E CORPORATION

-and-

PACIFIC GAS AND ELECTRIC
COMPANY

Debtors.

☐ Affects PG&E Corporation

☐ Affects Pacific Gas & Electric

☒ Affects Both Debtors

*All papers shall be filed in the Lead Case,
No. 19-30088 (DM)*

)
) **Case No. 19-30088 (DM)**
) Chapter 11
) (Lead Case)
) (Jointly Administered)
)
) **DECLARATION OF GEOFFREY B.**
) **REED IN SUPPORT OF SUPPLEMENT**
) **TO JOINDER ON BEHALF OF KAREN**
) **GOWINS IN WILLIAM B. ABRAMS'**
) **MOTION TO DESIGNATE**
) **IMPROPERLY SOLICITED VOTES**
) **PURSUANT TO 11 U.S.C. §§ 1125 (b)**
) **AND BANKRUPTCY RULE 2019**
)
) Docket Nos. 6799, 6798, 6801
)
) Date: May 12, 2020
) Time: 10:00 A.M.
) Place: United States Bankruptcy Court
Courtroom 17, 16th Floor
San Francisco, CA 94102

I, GEOFFREY B. REED, declare as follows.

I have personal knowledge of all of the matters to which I am testifying in this

Declaration.

1. On December 21, 2018, I retained the Watts Guerra law firm and Mikal Watts to

DECLARATION OF GEOFFREY B. REED IN SUPPORT OF SUPPLEMENT TO JOINDER ON BEHALF OF
KAREN GOWINS IN WILLIAM B. ABRAMS' MOTION TO DESIGNATE IMPROPERLY SOLICITED VOTES
PURSUANT TO 11 U.S.C. §§ 1125 (b) AND BANKRUPTCY RULE 2019

1 represent me regarding my claim against PG&E to recover my damages a resulting from the
2 Camp Fire. On April 22, 2020, I terminated Mr. Watts and associated counsel's representation.

3 2. I have read the "Declaration of Mikal Watts in Support of his Reply to Doc #6944
4 (Kane/Gowins) Regarding William B. Abrams Motion to Designate Improperly Solicited Votes
5 Pursuant to 11 U.S.C. § 1125(b) and 1126 (e) and Bankruptcy Rule 2019" (Doc #6973-1). I have
6 attached this declaration hereto as Exhibit "A." Paragraph 5 of Mr. Watts' Declaration states:
7

8 "So, WATTS GUERRA repeatedly has disclosed both orally and in writing to its entire
9 client base detailed information concerning its credit facility in detail, the assignees
10 thereof whom it met, and those with whom it negotiated whom were introduced to
11 WATTS GUERRA by such assignees, and repeatedly has passed those disclosures along
12 to all its clients in writing, and also made such disclosures publicly.

13 Declaration of Mikal Watts, attached as Exhibit "A" hereto, pp.2-3, ¶5.

14 3. Although I received weekly reports and updates via email from my former attorneys,
15 signed on behalf of Joe Early, Mauro Archer O'Neill LLC, Watts Guerra LLP and Law Office of
16 Douglas Boxer, I never received any information from them regarding the financing of Watts
17 Guerra by Centerbridge, Apollo or Stifel. Also, I have received no ballot or plan disclosure
18 materials from my former counsel.

19 4. The first information I received on this issue, was a video from another fire survivor on
20 April 7, 2020, purporting to be from one of Mr. Watts' 'town hall meetings' but I could not hear
21 what Mr. Watts was saying due to the poor audio quality of that video.

22 5. The method by which I learned about the financing Mr. Watts had obtained was from
23 Mr. Abrams' "Motion to Designate Improperly Solicited Votes Pursuant to 11 U.S.C. §§ 1125
24 (b) and Bankruptcy Rules 2019" where Mr. Abrams had attached a transcript of the town hall
25 meeting where Mr. Watts discussed Apollo, Centerbridge and Stifel. That motion was provided
26

1 to me by another fire survivor on April 20, 2020.

2 6. I would have liked to have known about how Mr. Watts' litigation was financed, as
3 well as his involvement with Centerbridge and Apollo, both whom had financial interests in
4 PG&E and the outcome of the bankruptcy. This was particularly important to me because of the
5 barrage of public electronic media and advertising direct mail, urging me to vote in favor of the
6 plan.
7

8 7. None of my prior lawyers or their affiliates in this case, including Watts Guerra and
9 Mikal Watts, have ever disclosed to me orally or in writing their existing or potential obligation
10 to Apollo and Centerbridge which are major financing participants in the proposed Plan.

11 8. None of my prior lawyers or their affiliates in this case, including Watts Guerra and
12 Mikal Watts have ever disclosed to me orally or in writing their past or current obligation to
13 Stifel.
14

15 I declare under penalty of perjury under the laws of the State of California that the
16 foregoing is true and correct and that I could testify competently as to these matters if called to do
17 so. Executed on May 5, 2020 at Redding, California.

18 s/Geoffrey B. Reed
19 GEOFFREY B. REED

20 Pursuant to Local Civil Rule 5-1(i)(3) of the U.S. District Court for the Northern District
21 of California as incorporated into the Local Bankruptcy Rules, I attest that concurrence in filing
22 this document has been obtained from the signatory, Geoffrey B. Reed.
23

24 /s/ Bonnie E. Kane
25 Bonnie E. Kane